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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY - TRENTON DIVISION**

In re:  EAGLE ROADWAYS, INC.   Debtor(s),	Bankruptcy No: 21-10174  Chapter: 11  Judge: Honorable Michael B. Kaplan
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**RESPONSE TO CROSS MOTION**

COMES NOW, Debtor, Eagle Roadways, Inc., to respond to the Cross Motion filed by Interpool, Inc. d/b/a Trac Intermodal (hereinafter "Interpool"). Debtor avers as follows:

1. On March 10, 2021, Interpool filed a Cross Motion seeking particular relief in response to Debtor's Motion to Compel which was filed on February 17, 2021. The hearing on Debtor's motion was set for March 18, 2021.
2. On March 15, 2021, Debtor filed a Motion to Convert Case to Chapter 7. The hearing on that motion is set to be conducted on April 15, 2021.
3. On March 16, 2021 Debtor filed a Notice of Withdrawal of Debtor's Motion to Compel.
4. For these reasons, Debtor respectfully suggests the Motion to Compel is moot and precipitously the

Cross Motion will become moot upon this court's ruling on Debtor's Motion to Convert. Therefore, Debtor suggests, absent any order rendering Interpool's motion moot, a hearing on the Cross Motion be set for a date following April 15, 2021.

DATED: March 16, 2021

/s/ Steven J. Sico  
Steven J. Sico  
Attorney for Debtor